

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No.: 13-CR-10023-DPW
)	
v.)	
)	
MICHAEL E. McLAUGHLIN)	
)	
Defendant)	

PROTECTIVE ORDER

Upon motion by the government and defendant and pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Local Rule 116 for a protective order which prohibits the disclosure of certain documents, except for the purpose of the legal defense and sentencing of this case, and which also restricts the disclosure of documents to certain individuals engaged in the defense and sentencing proceedings of this case, it is hereby ORDERED as follows:

1. With respect to all documents and information disclosed by the government to Thomas M. Hoopes, as counsel for the defendant, and, William Codinha, as counsel for the Chelsea Housing Authority (“CHA”) under this Order, such counsel may further disclose such documents and information only for the purposes of the sentencing proceedings in the above-captioned case. Mr. Hoopes and Mr. Codinha may disclose such documents and information to the following individuals:

- a. Colleagues in their offices who are directly engaged in assisting the sentencing proceedings of this case (defined to include partners, associates, and employees of counsels’ law firms, including secretaries and paralegals) and in the case of Mr. Hoopes the defendant herein;
- b. other persons retained by counsel for the purpose of assisting in the sentencing proceedings of this case, such as private investigators and experts.

2. Prior to disclosing any documents or information produced by the government under this Order to any person, counsel Mr. Hoopes and Mr. Codinha shall fully explain the terms of this Order and obtain from each person to whom such disclosure is made an acknowledgment of the terms of this Order and their agreement to comply with its terms. Each person to whom disclosure is made shall endorse a copy of this Order, which counsel shall preserve.

3. The government shall identify the documents and information subject to this Order at the time the documents are produced to counsel for the Mr. Hoopes and Mr. Codinha.

4. In the event Mr. Hoopes and Mr. Codinha contend that any document or information produced pursuant to this Order should not be covered thereunder, counsel shall notify the government in writing of the document or information and stated reasons why the document or information should not be covered by the Order. If the parties are unable to reach agreement, counsel reserve the right to file a motion for relief from this Order with the Court as to the document or information at issue.

5. This Order does not restrict the use of any such disclosed material by counsel for the defendant or counsel for the CHA in examining any witness in sentencing proceedings.

June 19, 2013
DATE

Douglas P. Woodlock
DOUGLAS P. WOODLOCK
United States District Judge

